

United States District Court  
for the  
Eastern District of Washington

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Dec 16, 2021

SEAN F. MCAVOY, CLERK

UNITED STATES OF AMERICA

v.

DANIEL J. ANDERSON

Case No. 4:21-MJ-07257-MKD

CRIMINAL COMPLAINT

I, Justin Bodes, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning on a date unknown but by on or about June 1, 2021 and continuing until on or about December 16, 2021, in the county of Benton in the Eastern District of Washington, the defendant violated:

Code Section

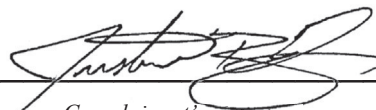
Offense Description

18 U.S.C. § 371

Conspiracy to Make or Possess an Unregistered  
Firearm or Destructive Device

This complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature  
Justin Bodes, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: December 16, 2021



Judge's signature  
Mary K. Dimke, United States Magistrate Judge

City and state: Richland, Washington

Printed name and title

*Assigned AUSA: PJC*

*County of Offense: Benton*

*In Re: Request for Criminal Complaint and Arrest Warrant charging Daniel J. Anderson with Conspiracy to Make or Possess an Unregistered Firearm or Destructive Device, in violation of 18 U.S.C. § 371.*

### **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Justin Bodes (hereinafter “Affiant”), being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since January 2020. I completed the Basic Field Training Course, FBI Academy, Quantico, VA in September of 2020. In completing this course, I received instruction in Constitutional Law and the establishment of probable cause. I am currently assigned to the Joint Terrorism Task Force Office (“JTTF”), Seattle Field Office, Richland, WA. After the FBI Academy, I received instruction in the recognition and investigation of domestic violent extremists, including those espousing anti-government and anti-authority beliefs and who advocate violence in furtherance of the same. Prior to the FBI, I was employed as a Border Patrol Agent in the United States Border Patrol for over 13 years and swore to several search warrant affidavits in furtherance of federal criminal investigations. Your affiant is an investigative or law enforcement officer of the United States within the meaning

of 18 U.S.C. § 2510(7), and is empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. Your affiant has participated in the execution of numerous search warrants and arrest warrants involving various offenses including violent crime, drug offenses, alien smuggling, fraud, and crimes against children. Through participation in this investigation, as well as previous work experience, your affiant has gained an understanding of certain anti-government and anti-authority violent extremist ideologies. Additionally, your affiant has knowledge of federal firearms regulations and the manner in which some people violate those regulations by modifying otherwise legal firearms or by constructing destructive devices, especially in furtherance of their anti-government and anti-authority ideologies.

3. As result of my training and experience, I know that it is a violation of 18 U.S.C. § 371 for any person to conspire with one or more individuals to commit any offense against the United States and one or more of such persons do any act to effect the object of the conspiracy.

4. As result of my training and experience, I know that it is a violation of 26 U.S.C. § 5861(d), for any person to receive or possess a firearm, which is not registered to him in the National Firearms Registration and Transfer Record.

5. As a result of my training and experience, I know that 26 U.S.C. § 5845(a)

defines a “firearm” as “(1) a shotgun having a barrel or barrels of less than 18 inches in length; (2) a weapon made from a shotgun if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 18 inches in length; (3) a rifle having a barrel or barrels of less than 16 inches in length; (4) a weapon made from a rifle if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 16 inches in length; (5) any other weapon, as defined in subsection (e); (6) a machinegun; (7) any silencer...; and (8) a destructive device.

6. As a result of my training and experience, I know that 26 U.S.C. § 5845(f) defines a “destructive devices” as - “any explosive, incendiary, or poison gas bomb, grenade, rocket, having a propellant charge of more than one quarter ounce, mine or similar device; any type of weapon by whatever name known which will, or which may be readily converted to, expel a projectile by the action of an explosive or other propellant, the barrel or barrels of which have a bore of more than one half inch in diameter.”

7. This affidavit is submitted in support of a criminal complaint and arrest warrant charging Daniel J. Anderson (“Anderson”) with Conspiracy to Make or Possess an Unregistered Firearm or Destructive Device, in violation of 18 U.S.C. § 371.

8. The facts and information contained in this affidavit are based on personal knowledge, as well as on the observations of other agents and officers involved in this investigation. This affidavit contains information necessary to support probable cause and is not intended to include each and every fact, overt act, and matter observed by me or known to the government.

### **Facts**

8. In March 2021, an FBI confidential source (“the CS”)<sup>1</sup> informed your affiant that Anderson illegally modified an AR-style pistol with a 10.5 inch barrel

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<sup>1</sup> The CS has no record of criminal history. The CS approached the FBI as a member of the Verified Bois based upon a concern for the activities of this group and agreed to cooperate for this motivation and for financial compensation. Your Affiant is not aware of any substance abuse issues or physical impairments that would impact their ability to recall events. The CS is familiar, through his/her membership in the group, with the anti-government/anti-authority sub-culture, and the “Boogaloo” ideology. CS regularly communicates through multiple internet and cellular-based mediums to adherents of this ideology located throughout Washington State and elsewhere. CS is very familiar with firearms and different provisions of the National Firearms Act. At the request of the FBI, the CS has

by attaching a collapsible shoulder stock, thus creating a short-barreled rifle. The CS was aware that such modification requires approval from the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in accordance with federal statutes. The CS indicated Anderson did so in furtherance of his anti-government/anti-authority extremist ideology. The CS described Anderson as a very security-conscious person who rarely discloses his plans to commit criminal acts, especially in text-based conversations. The CS further explained Anderson's membership in a group later referred to by the FBI as the "Verified Bois" group; the name of an internet-based chat group used solely by members of this group. The "Verified Bois" group is an anti-government/anti-authority extremist group whose members espouse the "Boogaloo" ideology and advocate violence motivated by this ideology.

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recorded audio and video meetings with Anderson and other Verified Bois group members during the investigation and has reported information that was independently corroborated. Based on the CS motivations, the corroborated information, and your affiant's training and background, your affiant believes the CS to be reliable. The CS has not previously worked as a CS for any other law enforcement agency.

9. “Boogaloo” is a term referencing a loosely-connected group of individuals who espouse anti-government/anti-authority sentiment and advocate violence in furtherance of the same. The term resonated with domestic violent extremists, especially those aligned within militia movements. Some domestic violent extremists have used the term to reference an impending politically-motivated civil war or uprising against the government following perceived incursions on Constitutional rights – including the Second Amendment – or other perceived government overreach. The “Boogaloo” is not a single cohesive group, but rather a loosely-defined concept arising from internet platforms which have become rallying points for some extremists. Individuals or groups subscribing to this ideology sometimes refer to themselves as “Boogaloo Bois” or “Bois” and variations thereof in order to avoid social media censorship.

10. Some “Boogaloo” adherents also incorporate accelerationist beliefs into their rhetoric. Accelerationism is a belief that the current political system is irreparable within the available solutions of politic reform, and therefore violent action is necessary to precipitate the dissolution of the current government system. This idea supports the use of violence against any political side in order to foment increasingly violent reactions and further accelerate the demise of the government.

11. According to the CS, the Verified Bois is the name of a Social Media Platform (Social Media 1) chatroom of an otherwise unnamed 30-member group of self-dubbed anarcho-capitalist extremists led by Conner Goodman. Members of the group would be willing to use force against law enforcement upholding laws the members believe are an infringement of the Constitution of the United States or another notion of personal freedom. Members are “waiting” for an over-aggressive law enforcement action, especially in regard to public protests, as an opportunity to target law enforcement officers with violence. Verified Bois group members understand they will not be able to win a sustained force-on-force attack against law enforcement. Consequently, they adopted asymmetric, guerrilla-style warfare tactics wherein they would target critical infrastructure or law enforcement officers individually. To this end, the Verified Bois group conducts regular training events wherein they practice small unit tactics, raids, firearms handling and manipulation, and survival skills.

12. Additionally, according to the CS through personal observations, some members of the VB group produced unregistered short-barreled rifles or unregistered explosive devices. The group communicates over various mediums including the internet-based Social Media 1 application, a video-conferencing application (Video Chat 1), encrypted e-mail service (Email Service 1), and the use



of hand-held radios to intercept law enforcement communications. Verified Bois group members share training videos, advice on tactics, trauma medicine, and methods to procuring or producing material for explosives, through their encrypted internet and cellular-based communications. The Verified Bois group maintains contact with other Boogaloo groups primarily through their group leader, Goodman.

13. The CS disclosed an April 2021 instance when Anderson used a radio and intercepted law enforcement radio communications during a local Kennewick Police Department (KPD) response to a neighboring apartment near Anderson's residence. After intercepting the communications and seeing an officer nearby, Anderson put on body armor and armed himself in case KPD attempted to enter his apartment.

14. Your affiant confirmed with KPD that officers had in fact responded to Anderson's apartment complex on April 13, 2021 for a suicidal ideation call from Anderson's neighbor.

15. The CS further disclosed in May 2021, the Verified Bois group planned a training event focused on nighttime raids and hit-and-run training. Around that time, Anderson told the CS that the Verified Bois were "getting serious" and done "messaging around."

16. In May 2021, the CS attended a Verified Bois group meeting. Anderson drove his gray Honda Odyssey bearing WA license plate BHT8358 to attend this meeting wherein members discussed assisting protestors at U.S. Immigration, Customs, and Enforcement facilities. Goodman remarked about loading a vehicle with Tannerite (a binary explosive compound commercially sold for target shooting) as a vehicle-born improvised explosive device. The CS reported that Anderson said using rim-fire Tannerite would be best because it could be detonated with a pistol.

17. In June 2021, the CS reported Anderson, using the moniker “kingsilence” in a text-based conversation using Social Media 1, discussed with other members of the Verified Bois group how to steal explosive materials and precursors from another member’s employer, as well as how to bypass security at a Sportsman’s Warehouse.

18. In June 2021, following a phone call with Anderson, the CS reported Anderson took a less active role in the Verified Bois group, citing the fact that too many members of the group were not taking the training seriously enough and they did not understand the group was “training to kill people right now.” Anderson planned to send money to Goodman for the purchase of fireworks. The CS advised that Anderson stated he intended to use the material in the fireworks to

construct explosive devices. In a Verified Bois group chat on Social Media 1, Anderson posted a comment that he was seeking nine to ten grams of flash powder and was also seeking fireworks containing magnesium and phosphorous.

19. In June 2021, your affiant equipped the CS with audio and video recording devices and conducted a controlled meeting between the CS and Anderson.

During this meeting, Anderson received M-80 style fireworks procured and provided by Goodman that were delivered by the CS at the behest of Goodman.

Upon reviewing the digital recordings, your affiant noted Anderson discussed how he had begun constructing homemade explosive devices including a claymore-style anti-personnel explosive device using a motorcycle battery case, ball bearings, and explosive materials derived from the M-80 style fireworks he just received.

Anderson stated that he planned to use the device as a booby trap, which the CS indicated may be stored inside Anderson's storage unit at his apartment complex.

20. During this same recorded meeting, Anderson also expressed a desire to construct a handheld explosive device using a Coke can lined with ball bearings and filled with explosive material from the M-80 style fireworks and an electric fuse. Anderson stated such devices could be used at protests or thrown over the front line of law enforcement officers and explode behind them. Anderson also expressed plans to construct flashbang grenades out of M-80 fireworks for use

against law enforcement. In a subsequent interview, the CS reported the explosive material Anderson intended to use to construct the devices was the material the CS delivered to Anderson from Goodman.

21. On June 24, 2021, your affiant consulted with an ATF Special Agent who confirmed that Anderson did not have a Federal Explosives License.

22. In June 2021, following an in-person meeting with Anderson, the CS reported Anderson would likely test the homemade explosive devices before using them operationally. Anderson planned to test a device against a ballistic shield. Anderson further told the CS that he was not happy with his family life and spoke of dying, preferring to die in a shootout with federal law enforcement. The CS also reported that Anderson recently named a new godfather for his children.

23. In July 2021, after an in-person meeting with Anderson, the CS reported Anderson said he was nearly finished with constructing his explosive devices. Anderson explained he designed his explosive devices to be small and portable so he could transport them in a backpack using his motorcycle. Anderson said this was important so he could deploy his explosive devices against law enforcement and escape from the scene easily and with speed.

24. In July 2021, your affiant equipped the CS with audio and video recording devices and conducted a controlled meeting between the CS and Anderson. Upon

reviewing the digital recordings, your affiant noted Anderson experienced problems with one of the explosive device designs. The ball bearings did not properly adhere to the sides of the device and Anderson planned to use a ceramic adhesive. Anderson continued to refine designs for construction of a claymore-style explosive device and would likely test it once the weather cooled down to mitigate fire dangers. Anderson sought mortar-style fireworks that contained magnesium.

25. In August 2021, following an in-person meeting with Anderson, the CS reported Anderson stated he recently conducted operational tests of three types of explosive devices he constructed. Based on these tests, Anderson determined the “flashbang” design and the “throwables” design were successful. The claymore-style design needed to be refined because this device had too much fragmentation and required a different housing. The CS also reported Anderson sought ammonium nitrate to create what Anderson described as “ANFO” ammonium nitrate/fuel oil and believed breaking down Tannerite could facilitate this mixture. Your affiant is aware that “ANFO” is a common acronym used in reference to ammonium nitrate/fuel oil is an industrial explosive.

26. In September 2021, the CS reported that Anderson discussed his explosive devices on Social Media 1. Anderson referred to his explosive devices as

“distraction devices.” However, in subsequent preserved chats and communications reviewed by your affiant, Anderson stated the following: “Cause they sum bitches aren’t training tools. I wouldn’t be anywhere near this thing. It’s going to throw shrapnel like a MF. I have one that’s unmolested, the rest are full fucking yeet. It will throw birdshot at least 20 yards.” Your affiant is aware “Yeet” is a slang term for “exclamation of excitement.”

27. On September 18, 2021, the Verified Bois group conducted a training event near Ellensburg, WA. Your affiant equipped the CS with audio and video recording devices and recorded various CS interactions with meeting attendees. In addition to other Verified Bois group members, the CS, Anderson, and Goodman attended the training. The CS reported Anderson drove his white Subaru Forester bearing WA license plate BSJ9945 to this event wherein Goodman gave Anderson a rusted Mossburg 835 shotgun. Anderson stated that he planned to cut down the barrel because Goodman wanted a short-barreled shotgun. During lunch, Goodman and Anderson, in the presence of the CS, discussed relays, switches, and different types of detonators. Anderson mentioned that the group needs to recruit a chemist or someone with a chemistry background.

28. In October 2021, the CS reported Anderson continued to refer to his explosive devices as “distraction devices” and if stopped by law enforcement

Anderson said he could use them against law enforcement to facilitate an escape.

The CS is not aware of any other location where Anderson would store these devices other than inside his storage unit or apartment.

29. On October 29, 2021, your affiant equipped the CS with audio and video recording devices and conducted a controlled meeting between the CS and Anderson at the Target Residence. Your affiant reviewed the recording associated with this meeting. During the meeting, Anderson showed the CS one of multiple explosive devices that Anderson constructed. The device had been sitting on a table inside of the Target Residence. Anderson described the construction of the device to the CS which included a casing of a glass “Ball” jar, paper with glued birdshot (shotgun pellets) as the filler and fragmentation, a charge consisting of a plastic tube wrapped with black electrical tape filled a presumptive explosive compound, a green fuse, and a reinforced lid. The following images depict Anderson holding one of his explosive devices and inserting the “charge” into the center of the device:





30. During the recording, Anderson explained that he reinforced the top of the jar in order to prevent it from “popping off” during the explosion, forcing the explosion outward through the glass jar. Anderson advised that he has several of



these devices and previously tested at least one of them. Anderson further indicated that the original claymore-style explosive device design did not work as planned when he tested it.

31. In December 2021, your affiant consulted with an ATF Special Agent who confirmed that Anderson did not have a Federal Explosives License, a Federal Firearms License, nor any firearms registered with the ATF.

32. In December 2021, your affiant reviewed the criminal history of Anderson as recorded in the National Crime Information Center (NCIC). Based on a review of this record, your affiant is not aware of any prohibition of Anderson's possession of legal firearms.

33. On December 2, 2021, your affiant equipped the CS with an audio recording device and recorded a telephone call between the CS and Goodman. Your affiant reviewed the recording from this conversation. During this telephonic conversation, Goodman acknowledged the fireworks he sold to Anderson were used in Anderson's construction of an improvised explosive device. Goodman agreed to sell multiple fireworks to the CS in order for the CS to build improvised explosive devices similar to those Anderson constructed.

34. On December 3, 2021, your affiant equipped the CS with audio and video recording devices and conducted a multi-day controlled meeting between the CS,

Anderson, Goodman, and other Verified Bois group members. Prior to the meeting, your affiant and another law enforcement officer conducted a search of the CS and the CS's vehicle and did not locate any contraband or explosive material. Your affiant reviewed the recordings associated with this meeting. During this meeting, Goodman sold twelve aerial-style pyrotechnic fireworks to the CS so the CS could use them to make improvised explosive devices. Later in the meeting, Anderson explained to the CS how to modify those fireworks to use their components in the construction of an improvised explosive device. Your affiant notes Goodman provided the CS the pyrotechnic fireworks before the CS was able to activate the video recording device. However, the CS was able to activate the video recording device prior to paying Goodman for the pyrotechnic fireworks.

35. In November 2021, FBI Special Agent Bomb Technician (SABT) Salman Khan, reviewed the recording made on October 29, 2021. SABT Khan indicated the item Anderson calls an "IED" is visually and would likely be functionally consistent with an improvised explosive device which generally consists of an explosive main charge, fusing system, and sometimes a container. SABT Khan further noted if the filler in the plastic tube was actually a low explosive or primary high explosive, this improvised explosive device, properly assembled and initiated,

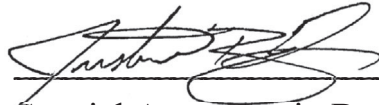
is capable of causing property damage, injury, and/or death due to rapid expulsion of shotgun pellets, broken glass fragments from the jar, flame, and hot gases.

36. On December 16, 2021, federal law enforcement agents executed a search warrant at Anderson's residence. Your affiant advised Anderson of his *Miranda* warnings, which he agreed to waive. During an interview with Special Agents, Anderson indicated that he developed an improvised explosive device using fireworks provided by Goodman and provided the Special Agents with a design diagram of the device. Additionally, while searching the location, with the assistance of Anderson, special agents located the improvised explosive device described by Anderson.

### **Conclusion**

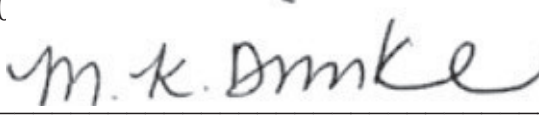
37. In summary, the overall object and plan of the conspiracy was to construct a destructive device for the use in attacking law enforcement officers and members of the conspiracy, specifically Anderson and Goodman, engaged in at least one overt act to accomplish the conspiracy's objective. Goodman procured fireworks that were delivered to Anderson to produce an improvised explosive device. Subsequently, Anderson designed, developed, and tested devices in furtherance of this conspiracy. Additionally, Anderson exhibited what he described as an improvised explosive device to the CS.

38. Based upon the facts above, I have probable cause to believe that beginning on a date unknown but by on or about June 1, 2021 and December 16, 2021, the defendant, Daniel J. Anderson conspired to make or possess an unregistered firearm or destructive device, specifically an improvised explosive device, in violation of 18 U.S.C. § 371.

  
Special Agent Justin Bodes  
Federal Bureau of Investigation

- ☐ Sworn to before me and signed in my presence.  
☒ Sworn to telephonically and signed electronically.

this 16th day of December, 20

  
The Honorable Mary K. Dimke  
United States Magistrate Judge

